## IN THE UNITED STATES DISTRICT COURT

#### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
<b>v.</b>	:	DATE FILED:

SHAWN K. JOHNSON : VIOLATIONS:

KEENAN DANAN QUINN 18 U.S.C. § 2113(a) (bank robbery - 1

: count)

18 U.S.C. § 2113(d) (armed bank robbery

: - 1 count)

18 U.S.C. § 924(c) (using and carrying a

: firearm during and in relation to a crime

of violence - 1 count)

: 18 U.S.C. § 922(g)(1) (felon in possession

of a firearm - 1 count)

: 18 U.S.C. § 2 (aiding and abetting)

## **INDICTMENT**

#### **COUNT ONE**

#### THE GRAND JURY CHARGES THAT:

On or about August 6, 2009, in North Wales, in the Eastern District of Pennsylvania, defendant

#### SHAWN K. JOHNSON

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Harleysville National Bank, 1498 North Wales Road, lawful currency of the United States, that is, \$5,332, belonging to, and in the care, custody, control, management, and possession of the Harleysville National Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

## **COUNT TWO**

#### THE GRAND JURY FURTHER CHARGES THAT:

On or about August 27, 2009, in King of Prussia, in the Eastern District of Pennsylvania, defendants

# SHAWN K. JOHNSON and KEENAN DANAN QUINN

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the National Penn Bank, 304 South Henderson Road, of lawful currency of the United States, that is, approximately \$9,293 belonging to, and in the care, custody, control, management, and possession of the National Penn Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants JOHNSON and QUINN knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of National Penn Bank, and other persons, by use of a dangerous weapon, that is, a Storm Ruger, 9mm semi-automatic handgun, serial number 30856125.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

## **COUNT THREE**

## THE GRAND JURY FURTHER CHARGES THAT:

On or about August 27, 2009, in King of Prussia, in the Eastern District of Pennsylvania, defendants

# SHAWN K. JOHNSON and KEENAN DANAN QUINN

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a Storm Ruger, 9mm semi-automatic handgun, serial number 30856125, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

## **COUNT FOUR**

# THE GRAND JURY FURTHER CHARGES THAT:

On or about August 27, 2009, in King of Prussia, in the Eastern District of Pennsylvania, defendant

# SHAWN K. JOHNSON,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Storm Ruger, 9mm semi-automatic handgun, serial number 30856125.

In violation of Title 18, United States Code, Section 922(g)(1).

## **NOTICE OF FORFEITURE**

# THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 922(g)(1), set forth in this indictment, defendant

## SHAWN K. JOHNSON

shall forfeit to the United States of America the firearm and ammunition involved in the commission of this offense, including, but not limited to, a Storm Ruger, 9mm semi-automatic handgun, serial number 30856125.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

	A TRUE BILL:
	GRAND JURY FOREPERSON
MICHAEL L. LEVY	
<b>United States Attorney</b>	